

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

JESUS GONZALEZ, *an individual*,

Plaintiff,

CASE NO.: 1:24-cv-21889-RKA

vs.

FARMACIA 22-24 CENTRO, INC.,  
*a Florida corporation*, and DOLORES M LLC, *a*  
*Florida limited liability company*,

Defendants.

---

**PLAINTIFF'S RESPONSE TO COURT ORDER REQUIRING VERIFIED**  
**CERTIFICATE OF COUNSEL REGARDING ANY PRIOR FILINGS UNDER**  
**THE AMERICANS WITH DISABILITIES ACT**

Plaintiff, JESUS GONZALEZ ("Plaintiff"), by and through his undersigned counsel, hereby files this Response to the Court's Order Requiring Verified Certificate of Counsel Regarding Any Prior Filings under the Americans with Disabilities Act (D.E. 4), and in support thereof would state:

1. Plaintiff filed a complaint (D.E. 1) in the instant matter on May 15, 2024, seeking declaratory and injunctive relief, attorneys' fees, expenses and costs (including, but not limited to, court costs and expert fees) pursuant to 42 U.S.C. § 12182 et. seq., and the 2010 Americans with Disabilities Act ("ADA").
2. Prior to filing said complaint, counsel for Plaintiff performed a search on PACER to determine whether there has been any litigation involving the named Defendants. No ADA cases were found.
3. Attached is a PACER search, which counsel for Plaintiff executed again on May 30, 2024, in response to the Court's Order. *See attached Exhibit A.*

4. As evidenced by this search, Plaintiff located no prior actions pursuant to 42 U.S.C. § 12182 (ADA) against Defendants, FARMACIA 22-24 CENTRO, INC., and DOLORES M LLC.
5. Additionally, as per the search, Defendants, FARMACIA 22-24 CENTRO, INC., and DOLORES M LLC are not involved in any additional pending ADA actions pursuant to 42 U.S.C. § 12182.

DATED this 30<sup>th</sup> day of May, 2024.

Respectfully Submitted,

**LAW OFFICES OF NOLAN KLEIN**

*Attorneys for Plaintiff*

5550 Glades Road, Suite 500

Boca Raton, FL 33431

PH: (954) 745-0588

By: /s/ Nolan Klein

NOLAN KLEIN, ESQ.

Florida Bar No. 647977

[klein@nklegal.com](mailto:klein@nklegal.com)

[amy@nklegal.com](mailto:amy@nklegal.com)

and

**ENTIN LAW GROUP, P.A.**

*Co-counsel for Plaintiff*

1213 S.E. Third Avenue

Fort Lauderdale, FL 33316

Tel: (954) 761-7201

By: /s/ Joshua M. Entin

JOSHUA M. ENTIN, ESQ.

Florida Bar No. 493724

[josh@entinlaw.com](mailto:josh@entinlaw.com)

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that a copy of the foregoing instrument was e-filed with the Clerk of the Court using CM/ECF, this **30th** day of **May**, 2024.

By: /s/ Nolan Klein  
NOLAN KLEIN, ESQ.  
Florida Bar No. 647977